



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

March 27, 2020

The Honorable Edgardo Ramos  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Rolando Heredia*, 20-cr-238 (ER)**

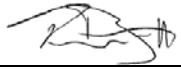
Dear Judge Ramos:

On March 26, 2020, a grand jury returned an indictment charging defendant Rolando Heredia with possessing a firearm after sustaining a felony conviction, in violation of 18 U.S.C. § 922(g), and the Armed Career Criminal Act sentencing provision of 18 U.S.C. § 924(e). This Court was assigned the case, and an initial conference is scheduled for April 23, 2020, at 10:15 a.m. The parties are discussing an appropriate date for an arraignment before that conference.

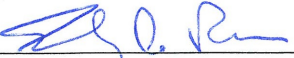
The Government writes to respectfully request that time under the Speedy Trial Act be excluded between the date of this letter and April 23, 2020, in the interests of justice and pursuant to 18 U.S.C. § 3161(h)(7). The defendant was initially charged by complaint on January 28, 2020 with the same felon-in-possession offense as is contained in the above-captioned Indictment. Detectives from the New York City Police department arrested him on January 29, 2020, and Sarah Sacks, Esq. was appointed counsel at the presentment that day. Since then, the parties have engaged in discussions about a possible pre-trial resolution to the case. The Government understands that, in light of the present public-health situation, Ms. Sacks has had limited opportunity to speak with the defendant about those discussions. Accordingly, the Government submits that the interests of justice weigh in favor of excluding time under the Speedy Trial Act so the parties can continue their discussions and Ms. Sacks can confer at greater length with the defendant. Ms. Sacks consents to the requested exclusion of time.

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney

by:   
Thomas S. Burnett  
Assistant United States Attorney  
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The application is   X   granted  
   denied

  
Edgardo Ramos, U.S.D.J.  
Dated: April 1, 2020  
New York, New York